### USDOL REGION 3 FISCAL FORUM

Introduction to Grants

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#### **Grants Administration**

The Grant Relationship

Hierarchy of Legal Authority

Steps in The Grants Cycle

### The Grant Relationship

Federal Government

Recipient

Contractor

Subrécipient

Subcontractor

### Flow Through Concept

Law of Privity

Applicable Laws, Regulations and OMB Circulars

### Order of Legal Authority

- Program Statute
- Cross-Cutting Laws
- Code of Federal Regulations (CFR)
- Office of Management & Budget (OMB) Circulars
- Grant Agreement
- Federal Policy

#### Statute/Laws

Program Statute

Cross-Cutting Laws

Specific Law Covering each program – for example: Workforce Investment Act (WIA); Wagner Peyser Act Assurances

Compliances

**Executive Orders** 

# Code of Federal Regulations

Title 29 U. S. Department of Labor

Contains all the program rules and regulations

Parts and/or chapters each pertaining to separate program rules

# Office of Management and Budget (OMB) Circulars

State, Local & Tribal Governments

Requirements: Circular:

Administrative A-102

Cost Principles A-87

Audit A-133

# Colleges and Universities

Requirements: OMB Circulars:

Administrative A-110

Cost Principles A-21

Audit A-133

### Non-Profit Organization

Requirements: OMB Circulars:

Administrative A-110

Cost Principles A-122

Audit A-133

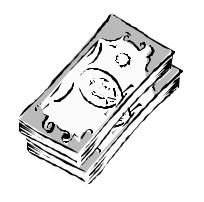
### For Profit Organizations

Requirements: OMB Circulars:

Administrative A-110

Cost Principles FARs 31.2

Audit Program Specific



### Grant Agreement

- Legal Instrument for Relationship between Parties
- Terms and Conditions
- Time Frames
- Scope of Work Narrative
- Funding Budget

### Federal Policy

Is Not Considered Law

Rather the Wishes/Position of the

Agency



### The Grant Cycle

Pre-Award Phase

Post-Award Phase

After the Grant Phase

# Business and Grant Capability

- Procurement Mgmt. & Standards
- Property Mgmt. & Standards
- Personnel Management
- Travel Policy & Procedures
- Program/Project Management
- Financial Management

# Pre-Award Requirements

- Purpose/Policy
- Forms for Applying for Federal Assistance
- Debarment and Suspension
- State Plans
- Special Award Conditions 'High Risk'

#### Pre-Award Phase



- Announcement/Solic itation
- Needs Assessment
- Application Narrative
- Budget Development
- Review Process
- Negotiations

# Post-Award Requirements

- Financial and Program Management
- Property Standards and Management
- Procurement Standards and Management
- Reports and Records
- Termination and Enforcement

#### Post-Award Phase

Program Activity

Administrative Activity

Financial Activity

# Examples of Post-Award Program Activity

- Accomplish Specific Goals and Objectives
- Tracking the Project
- Monitor the Project
- Reporting the Progress



# Examples of Post-Award Administrative Activity

- Human Resource Management Policy
- Travel Policies
- Procurement/Property Policies
- Retention of Records
- Liability/Bonding

# Examples of Post-Award Financial Activity

- Monitor Budgets
- Analyze Cost
- Recording Cost
- Preparing Financial Reports
- Cash Management
- Implementing Internal Controls

# After-the-Award Requirements

Closeout Procedures

Adjustments – Disallowances

Collections of Amounts Due

Reconcile Accounts

#### After-The-Grant Phase

Adjustments for: PYE and FYE

Closeout Process

Single Audit Conducted

Audit Resolution



### Cost Principles

Flow-Through Concept

Direct Grant or Subgrant

Entity is to use the Applicable Cost Circulars Developed for Their Specific Organization

# Purpose and Use For Cost Principles

- To Ensure Federal Agency Pays Fair Share of Cost
- Required by Grant
- Classification of Cost Selected Items of Cost, Cost Categories
- To Determine Allowable Cost Note:Payment from Feds is only for allowable costs incurred for eligible activity

#### Classification of Cost

Direct – Identified Specifically Indirect Cost – Common or Joint Benefit

**Function** 

Program

**Project** 

**Activity** 

Task

All entity programs
benefit; for
example: Human
Resources, Top
Management,
Accounting Services

### Criteria For Allowability

- Necessary and Reasonable "Prudent Person Test"
- Allocated by Benefit Received
- Treated Consistently as Direct or Indirect
- Net of All Applicable Credits "Discounts, Refunds, Rebates"

# Criteria for Allowability (Cont.)

- Accordance with GAAP
- Adequately Documented "Required Specifically", "Good Audit Trail"
- Not Included as a Cost or Used to Meet Matching Requirements
- Authorized or Not Prohibited Under State/Local Laws

# Criteria for Allowability (Cont.)

- Confirms to Any Limitations or Exclusions Concerning Type or Amount of Cost as Set Forth In:
  - Applicable Cost Principles
  - Federal Laws and Regs
  - Grant Award Terms and Conditions
  - Other Governing Regs, ie., CMIA

# Criteria for Allowability (Cont.)

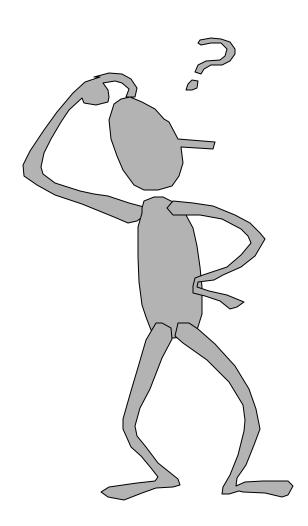
Consistent With the Policies and Procedures of the Grantee or Recipient, Which Apply to Both Federal Awards and Other Activity of the Organization

#### Websites:

http://www.whitehouse.gov

http://www.doleta.gov/

# Any Questions?



# Th-th-that's it- that's all folks!

